**Lee, David**

**Page 1 of 1**

**WD0023**

**From:** David Lee [redacted]
**Sent:** Tuesday, July 01, 2008 12:16 PM
**To:** NBAFProgramManager
**Cc:** Terry Hastings
**Subject:** concerns with the EIS

Dear NBAF Program Manager,

1| 19.0 The issues listed below have been raised by one of our faculty members who carefully read the EIS section on Health and Safety. We offer them for your consideration/comment.

1. Appendix E: In calculating the effects of wind on the spread of the plume, why were wind rose data (frequency of winds blowing *from* particular directions) not used?

2. Appendix E: Why does the calculation for exposure resulting from grazing include the total time that the receptor (cow) is exposed, but the calculation for breathing is based on approximately 1 second?

2| 19.2 3. Page 3-443: Distribution of FMDV in Clarke/Oconee counties.
Area = ($\pi r^2$).
The number of cattle exposed appears to be calculated on a **5-km radius** (3.14 x $5^2$ = **78.5 km$^2$**), not a **10-km radius** (3.14 x $10^2$ = **314 km$^2$**), as stated.
The area within the radius should be **314 km$^2$** not **78.5 km $^2$**.
Thus, if there are 20-30 livestock per km$^2$ in Clarke and Oconee counties (GA), that would mean 6280 to 9420 livestock are exposed in an unmitigated accident within the 10 km radius, not 1570 to 2355 ("as many as 2300 cattle.")

Thanks.

David

David Lee, PhD
[redacted]
GA
[redacted]

Comment No: 1 Issue Code: 19.0
Wind rose data were used in the analysis. While a wind rose was not presented, the data obtained from the NOAA website referenced in the DEIS contains the wind speed, direction, and rain fall events for each hour for an entire year. This is the form that the data needs to be in to use the MACCS2 dispersion code. This data could be presented in the form of a wind rose however, the raw data is more accurate presentation than a wind rose diagram, which has to be interpreted.

The calculation for inhalation is not based on a 1 sec duration because the concentration is presented in terms of s/m3. The ground concentration on the other hand is in units of pathogens per unit area, so the ingestion route has to be estimated by considering the total area covered by the animal. The entire accident release in on the order of 1 hour (therefore at a wind speed of 1 meter per second the down-wind distance traveled would be on the order of 3,600 meters or 3.6 km). The modeled results were extrapolated out to distances of 10 km because that is the limit of the dispersion model used.

The MACCS2 code is designed to estimate accident consequences and as such is a time-integrated model of the Gaussian Plume. The net result is that the concentration estimates represent the 95% confidence limits for the specified down-wind distances and as such do not translate into the typical plumes that are dependent on a specified wind speed and direction. The 95% confidence limits take into account all of the wind speeds and directions measured over the entire year. This estimate is therefore more conservative than assuming a specific wind direction and speed. The EIS has been modified to clarify this issue.

Comment No: 2 Issue Code: 19.2
DHS agrees with commentor. The calculated values are based on a 5 km radius and not 10 km where the concentration of pathogens falls off precipitously. The DEIS has been modified to correct this error.

**Lee, David**

**Page 1 of 1**

WD0192

**From:** David D Lee [redacted]
**Sent:** Wednesday, August 06, 2008 7:58 AM
**To:** NBAFProgramManager
**Subject:** lab proposal

1| 19.2

2| 25.2 | This lab would be dangerously too close to such a large populous of peple. I say no to this proposal.

Comment No: 1 Issue Code: 19.2

DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including releases due to weather events. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations, including institutionalized populations, residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated.

Comment No: 2 Issue Code: 25.2

DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

**LeGrand, Harry**

**Page 1 of 2**

FD0093

North Carolina Department of Environment and Natural Resources

Michael F. Easley, Governor

William G. Ross Jr., Secretary

August 22, 2008

**MEMORANDUM**

TO: Melba McGee, DENR Environmental Coordinator

FROM: Harry LeGrand, Natural Heritage Program

SUBJECT: Proposed Development of the National Bio- and Agro-Defense Facility, Butner, Granville County

1|14.3 The Natural Heritage Program has identified numerous significant natural heritage areas in the general Butner visinity, many of which are of National significance. The following are the closest to the location of the proposed facility (just north of the Dillon School):

2|13.3; 1Cont.|14.3 Camp Butner Game Land (County significance, approximately 0.3 mile to the west)
Knap of Reeds Creek Diabase Forest and Glades (National significance, approximately 0.7 mile to the southeast)
Knap of Reeds Creek Ravine (County significance), approximately 0.7 mile to the east)
Knap of Reeds Creek Diabase Levee and Slopes (National significance, and most is a Registered Natural Heritage Area – registered with the U.S. Army Corps of Engineers; approximately 0.8 mile to the south)

Please do not hesitate to contact me at 919-715-8697 if you have questions or need further information.

Enclosure

1601 Mail Service Center, Raleigh, North Carolina 27699-1601
Phone: 919-733-4984 \ FAX: 919-715-3060 \ Internet: www.enr.state.nc.us/ENR/

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NCDENR 9197153068 08/25/2008 16:39 Fax:919-733-9571 Aug 25 2008 10:55 P.10 PAGE 12/23

Comment No: 1 Issue Code: 14.3

DHS acknowledges the commentor's concern regarding the proximity of the Umstead Research Farm Site to the Camp Butner Game Land and significant natural heritage areas. Sections 3.8.7.1.1, 3.8.7.1.4, and 3.1.7.5 of the NBAF EIS acknowledge the presence of the Game Land and the natural areas associated with the Butner Natural Areas Macrosite. With the exception of the Camp Butner Game Land, all of the natural areas are separated from the boundary of the Umstead Research Farm Site by distances of at least 0.7 mile. Therefore, the NBAF would not be likely to affect these sites. The Umstead Research Farm Site is located within the Camp Butner Game Land. Section 3.8.7.2.4 acknowledges impacts to approximately 30 acres of wildlife habitat within this area. The potentially impacted areas consist of disturbed scrub-shrub habitat that has been impacted by a recent clear cut. Approximately 200 acres of scrub-shrub habitat would be retained; along with streams, stream buffers, and mature forested communities that occur on the property. The EIS acknowledges the importance of successional (i.e., scrub-shrub) habitats for neotropical migratory bird species. However, given the disturbed condition of the potential project area and the 200 acres of scrub-shrub habitat that would be retained, the NBAF is not likely to have significant impacts on natural communities or wildlife populations within the Camp Butner Gameland.

Comment No: 2 Issue Code: 13.3

DHS acknowledges the commentor's concern regarding the proximity of the Umstead Research Farm Site to the Camp Butner Game Land and significant natural heritage areas. Sections 3.8.7.1.1, 3.8.7.1.4, and 3.1.7.5 of the NBAF EIS acknowledge the presence of the Game Land and the natural areas associated with the Butner Natural Areas Macrosite. With the exception of the Camp Butner Gameland, all of the natural areas are separated from the boundary of the Umstead Research Farm Site by distances of at least 0.7 mile. Therefore, the NBAF would not be likely to affect these sites. Section 3.8.7.2.4 acknowledges impacts to approximately 30 acres of wildlife habitat. The potentially impacted areas consist of disturbed scrub-shrub habitat that has been impacted by a recent clear cut. Approximately 200 acres of scrub-shrub habitat would be retained; along with streams, stream buffers, and mature forested communities that occur on the property. The EIS acknowledges the importance of successional (i.e., scrub-shrub) habitats for neotropical migratory bird species. However, given the disturbed condition of the potential project area and the 200 acres of scrub-shrub habitat that would be retained, the NBAF is not likely to have significant impacts on natural communities or wildlife populations within the Camp Butner Gameland.

**LeGrand, Harry**

**Page 2 of 2**

**Lemons, Frank**

**Page 1 of 2**

MD0144

My name is Graham Frank Lemons,
I have been in [redacted] For 49 years.
1| 25.3 I am very much opposed To NBAF building in The Butner area.
2| 19.3 The risk of danger To The people in and around The Butner area!

I live at [redacted] about 3½ miles From proposed site

Comment No: 1 Issue Code: 25.3
DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 19.3
DHS notes the commentor's concern. Section 3.14 and Appendix E of the NBAF EIS state that the specific objective of the hazard identification is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Appendix B describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operation of the NBAF then site-specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed the NBAF. Procedures and plans to operate the NBAF will include community representatives as described in Section 2.2.2.6 of the NBAF EIS.

**Lemons, Frank**

**Page 2 of 2**

MD0144

From
Fran W Lemons
[redacted]

RESEARCH TRIANGLE REGION
NC 275 5
22 AUG 2008 PM

RECEIVED BY S&T
2008 NOV 13 A

US Dept. of Homeland Security
Science & Technology Directorate
James V. Johnson
Mail Stop #2100
245 Murray Lane SW Bldg 410
Washington, DC 20528

DEPARTMENT OF HOMELAND SECURITY
OCT 14 2008
INSPECTED #2

20528+0004

**Lender, Robert**

**Page 1 of 1**

**PD0072**

August 15, 2008

1|25.4 This is Robert Lender in [redacted] Kansas, and I am opposed to establishing the bio security research institute here in [redacted]

2|21.4 I have a daughter who lives in England near where the catastrophes of 2001 and 2007 occurred, and the possibility of human error is just too great to expose the citizens of this community to anything even like that.

I happen to know human nature very well, and I don't want anything like that around me, or near me, or near anybody that I care about.

1 cont.| 25.4 So, we do not want...my family does not want that bio lab here in [redacted] Kansas or near it.

Thank you very much for listening to my comments.

Good bye.

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 21.4

DHS notes the commentor's concern regarding the potential consequences from a NBAF accident or pathogen release as the result of human error. As described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B of the NBAF EIS provides a comprehensive list of BSL-3 and BSL-4 laboratoryaccidents results, and consequences of theaccidents Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including external events such as a terrorist attack. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

**Leopold, Ida**

**Page 1 of 1**

**PD0137**

August 18, 2008

Yes,

This is Ida Leopold, and I live at [redacted] Kansas [redacted]
My telephone number is [redacted]

1| 25.4 I am a retired person with a husband and a foster son whom I'm fixin' to adopt, and I do not want this research facility in my town.

2| 21.4 I really think it's dangerous and I'm afraid something will get loose. And I don't think that enough consideration has been given to even a natural disaster happening in this area.

So, please do not put it here.

Thank you.

Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 21.4
DHS notes the commentor's concern. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. The risk of an accidental release of a pathogen is extremely low. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and human health consequences of potential accidents, Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents,, external events, and intentional acts.

The NBAF would be designed to withstand the normal meteorological conditions that are present within the geographic area of the selected site. The basis for establishing the anticipated wind speeds were the International Building Code, ASCE 7 and the local jurisdictions. However, because of code specified building importance modification factors and normal factors of safety incorporated into the structural design, the facility would resist wind pressures up to 170% of the code specified 50-year wind pressures. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period. In the unlikely event that a 500-year wind storm strikes the facility, the exterior walls and roofing of the building would likely fail first, and this breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. The loss of these architectural wall components would decrease the overall wind loading applied to the building and therefore diminish the possibility of damage to the building's primary structural system. Even with the failure of these interior and exterior wall systems under an extreme wind loading event, the robust construction used to construct BSL-3Ag and BSL-4 spaces, reinforced cast-in-place concrete walls, would resist these wind forces and the primary bio-containment envelope would not be breached.

**Leopold, Tom**

**Page 1 of 2**

PD0124

August 20, 2008

Yeah,

1| 25.4 My name is Tom Leopold. I'm a resident of [redacted] Kansas, and I'm calling to express my opposition to building the damn thing here.

2| 19.0 Specifically, the GAO report seems important when it concluded that foot and mouth disease can't be safely done on the mainland. I mean that's pretty cut and dried right there.

We did have a meeting last night of people opposing this. They are not very well organized, so this thing kind of just slipped under the radar. People haven't noticed it, but the more people that I seem to talk to, the more they are opposed to it. Sam Bromback said they had the full community support, well obviously at the meeting there was people that spoke against it. So they didn't have full community support there. More and more people are becoming more and more aware of this and opposed to it.

3| 5.0 I think even after the deadline, you're going to be hearing more and more from us. I think we're...we don't want it. It belongs on an island or send it down to Mississippi. Those people seem to want it. They can have it.

4| 19.4 My wife is a nurse at the local hospital and works the night shift and I don't feel like going to bed every night wondering what she's going to come home with. And I know you guys think that the chances are none to slim that something's going to happen, but something can happen. Even after...look at the recent anthrax misadventure.

5| 15.4 Look, we got the largest concentration of livestock in the country, right here in [redacted] Not only in [redacted] County, but on the campus directly by the facility. We've got a first-class retirement center. We've got a strong economy as it is. We just got a contract at GE aviation to build a plant here. We've got plenty of jobs. We don't need it, and we don't want it. I think the more people that are becoming aware of this, the more you're going to hear against it. And I know you're dealing with time constraints, but it's just incredible the people that I talk to that aren't even aware of this and as soon as I talk to them, they go, "What? They're going to do what? The worse pathogens on earth in our back yard. Is that what our town wants to be known for?"

3 cont.| 5.0
6| 5.0 So, I don't see what's wrong personally, with leaving it on an island like everybody else that studies stuff, that isolate it, or why not have portable biological labs that you could study it in the country of origin, and that way we wouldn't have to even bring that stuff to this hemisphere. I mean after all you could use a secured video hookup, if the people from K State wanted to participate. My God we've waged war for years with secured video hookup and it's been just fine.

Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 19.0
DHS notes the commentor's position and concern for locating NBAF on a mainland site. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF, would enable NBAF to be safely operated on the mainland.

Comment No: 3 Issue Code: 5.0
DHS notes the commentor's opposition to the five mainland site alternatives. The conclusions expressed in Section 3.14 of the NBAF EIS show that even though the Plum Island Site has a lower potential impact in case of a release, the probability of a release is low at all sites. The lower potential effect is due both to the water barrier around the island and the lack of livestock and susceptible wildlife species.

Comment No: 4 Issue Code: 19.4
DHS notes the commentor's concern. Risks to human populations at each alternative site were evaluated and discussed in Section 3.14 and Appendix E of the NBAF EIS. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low.

Comment No: 5 Issue Code: 15.4
DHS notes the commentor's opinion.

Comment No: 6 Issue Code: 5.0
DHS notes the commentor's suggestion. However, as described in Chapter 1, the purpose and need for the proposed action encompasses the need for integrated, BSL-4 laboratories in the United States necessary to conduct research and develop countermeasures for zoonotic and foreign animal diseases.

**Leopold, Tom**

**Page 2 of 2**

**PD0124**

The people that want to bring it to this town are not the local second and third generation people. They're scientists that will go wherever you build the damn thing. And it's politicians that have interest. And its people at the university that are what you would call transients. In other words, they've been her for 10 to 15 years maybe. They're going to work here and then they're going to go work somewhere else. They don't give two hoots about the community, about what we've got going on here.

I think you're going to get more and more comments, the more local people find out about this, the more dissatisfied we are and I can tell you for sure, just from the people that I've talked to and we've started a petition drive that you probably will find out and you will be receiving some petitions, as many as we could get together in the short time that we've had to organize this.

1 cont.| 25.4
2 cont.| 5.0

We just frankly, just don't want it. And I don't want to go on and on using up your message time with all the reasons. But, I think the GAO account pretty much sums it up. After all they are suppose to be a neutral government organization that looks into this stuff and makes a recommendation and I think you really need to take that into consideration.

Okay, great. Thanks for taking my message and hope you guys figure this out right.

Bye now.

**Leopold, Tom**

**Page 1 of 1**

**PD0150**

August 21, 2008

1| 25.4
2| 5.0
3| 15.4

My name is Tom Leopold and I'm calling from [redacted] Kansas to oppose the building of the facility here and on the mainland for that matter. But my concern today is, is sports, and I don't know if you're aware that big twelve sports are pretty big in our town and my concern is what's gonna happen to recruiting if you build the facility here. I don't know if you're aware of it, but last year we had two freshmen in the NBA draft. One was taken, number two. He was from Washington, DC and my concern is that when we go to recruit a athlete and they look at the Internet and they see a website for your facility that states what you do or the possibility that a disgruntled Manhattanite leaves town and starts a website that says something like "Manhattan–Home of the World's Worst Pathogens." My concern is that this recruit's going to say, "Kansas State – Stanford", and he's going to go to Stanford. So that's just another reason why I don't think you ought to build it here. You know the rest of them, I'm sure a lot of them. So, thanks for posting my concerns. I'll see if I can get you another one tomorrow.

Bye.

Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 5.0
DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 3 Issue Code: 15.4
DHS notes the commentor's concern. The impacts raised by the commentor are not within the scope of the NBAF EIS, which evaluates the environmental impact of the no action alternative and the alternatives for constructing and operating the NBAF.

**Leopold, Tom**

**Page 1 of 3**

07/02/2008 18:28 [redacted] DEBORAH RANDOLPH PAGE 01

FD0032

August 20,2008

Dear Mr. Johnson:

I have sent this letter via US mail but am also faxing it because of advice given at a meeting of opponents last night. The reason is because of delay in checking mail for anthrax.

We had a good attendance at the meeting last night and [redacted] people, those that were aware of the proposal and those who are just learning of it, are not [redacted] More and more people are becoming aware of it and more and more people just don/t want it.

1| 25.4
2| 5.0

Send it to an island or somewhere they want it.

Sincerely

Tom Leopold

Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 5.0
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

**Leopold, Tom**

**Page 2 of 3**

07/02/2008 19:28 [redacted] DEBORAH RANDOLPH PAGE 02

FD0032

August 17, 2008

U. S. Department of Homeland Security
Science and Technology Directorate
James V. Johnson
Mail Stop #2100
245 Murray Lane, SW, Building 410
Washington D.C. 20528

Dear Mr. Johnson:

I am a photographer, Vietnam era submarine veteran and a long time [redacted] I am writing against building any proposed facility on the mainland and specifically in Manhattan, Kansas. 1 cont.| 25.4 2 cont.| 5.0

I attended the scoping meeting and the last two sessions earlier this month. It seems the politicians and scientists had dollar signs and big time glory in mind Certainly it would be hard to find someone against doing the research. But as the opponents kept returning to, common sense dictates you don/t built it in the middle of the largest concentration of livestock in the country.

Senator Sam Brownback speaking by video at the last meeting stated the proposed facility has the full support of the community. As you know from the comments that day there was opposition to building it in Manhattan. And since that day the opposition has grown. I talk to people daily who where unaware or misinformed of the proposal. And I am not blaming you or anyone for that. They are just busy living their lives raising kids and all of that to get the word. Perhaps the best of way of getting an accurate response of community acceptance would have been to put it on the ballot or a census like information gathering system. 3| 4.0

You probably know by now of the web site nonbaf in Kansas. (http://nonbaf.wordpress.com/ ). I submit to you that the opposition is growing daily and the people of the Manhattan area aren/t the type to give up. One only has to see what happened when the north side development got out of hand. A citizens groups filed a lawsuit over the size of a grocer store and construction came to a halt and it is still under appeal. I trust they will become more organized as the word spreads even if it is after your dead line.

My concerns are many;

A women from the local hospital spoke at the last meeting stating that they where prepared to deal with what ever comes there way [redacted] Last week they had a heart attack patient they had to ship out because they were/t able to deal with it. Should the unthinkable happen I doubt they would be prepared to handle it. 4| 19.4 [redacted]

According to an ap story Foot and Mouth virus can be carried on a worker's breath, clothes or vehicles leaving the lab for a week and they must wait a week before attending any event where animals might perform. We have various livestock on the campus in very close proximity to the proposed facility and on the edges of town in every direction they

Comment No: 3 Issue Code: 4.0

DHS notes the commentor's support for a referendum to measure public opinion regarding the siting of NBAF at the Manhattan Campus Site. Several factors will affect the decision on whether or not NBAF is built, and, if so, where. The NBAF EIS itself will not be the sole deciding factor. The decision will be made based on the following factors: 1) analyses from the EIS; 2) the four evaluation criteria discussed in Section 2.3.1; 3) applicable federal, state, and local laws and regulatory requirements; 4) consultation requirements among the federal, state, and local agencies, as well as federally recognized American Indian Nations; 5) policy considerations; and 6) public comment.

Comment No: 4 Issue Code: 19.4

DHS notes commentor's concern that responders personal protective equipment (PPE) provides adequate protection from biological agents. Section 2.2.2 of the NBAF EIS provides information on the general types of Standard Operating Procedures (SOP) that will be prepared subsequent to the NBAF Record of Decision call for the design, construction, and operations of the NBAF. SOPs will include site specific operation and maintenance SOPs, release mitigation procedures and emergency response plans. The emergency response plans would be developed in coordination with local emergency response agencies and would include training to ensure adequate protection of responders.

**Leopold, Tom**

**Page 3 of 3**

07/02/2003 18:28 [redacted] DEBORAH RANDOLPH PAGE 03

FD0032

could go. I don/t know how they could avoid them.

I was particularly struck by the testimony of one scientist in the evening session. He came in the side door and told us about all the research he had done and what he had been working on. By his own admission he had only been in Manhattan 9 months. He was impressed with the lack of traffic (some of us who have been around here awhile feel there/s way too much traffic these days) and 10 minutes to the airport and a quick flight to an international airport. He then ducked out the side door apparently in to much of a hurry to listen to what some of the locals might think. I submit to you that wherever you build it he and all the scientists will be there. 5| 5.0

A lot of us locals like our small town the way it is and don/t want to add to the mix of farmers, ranchers, artists, college students and professors an abundance of scientists and money which will change the flavor of our little town.

Within a mile of the proposed site is a first class retirement center, listed in the top 10 in the country. Who would want to live there next to armed guards guarding the worst biological pathogens on earth? We also have a PGA golf course with in a mile. And a proposed prairie museum along with a art museum, big 12 sports, and a strong enough economy. I feel what we are going to gain economically will not even make up for the economic lost from just having it in town. And that/s not considering the lost if the unthinkable, which is possible, happens. And I also fear for my ranchers and farmers friends who are being asked to see the possibility of generations of their life's works go down the drain. 6| 15.4

You know the risks we are being asked to take. Tornadoes, earthquakes, disgruntled employees, accidents you name it, By your own admission the risk are none to slim. You cannot guarantee it/s 100% safe. 7| 21.4 8| 11.4 9| 21.4

Then there is the issue of homeland security being prepared or able to handle an outbreak of pathogens in our community. Judging from the DHS performance during Katrina when they were dealing with something you could see, broken levees, rising water, people on rooftops, people at the super dome and all of this with days of advance warning of the coming hurricane. I I have little faith in the DHS dealing with biological pathogens that you can/t even see or begin to monitor in the reality that they escape. Or in their honest assessments given the statements by the EPA on the air quality at ground zero after the tragedy of 911. 10| 2.0

Therefore common sense once again dictates an island such as Plum Island or portable facilities in the country of origin with secure video hookups for participation of any and all other scientists. After all we have waged war like this for years. At any rate it certainly does not belong in the middle of the largest concentration of livestock in the county. 11| 24.1 12| 5.0

I can tell you there is a growing dislike amongst the locals for your lab in our back yard.

I urge you again to use common sense and keep it off the mainland and certainly out of Kansas

Respectively Submitted;

Tom Leopold
[redacted] Kansas [redacted]

Comment No: 5 Issue Code: 5.0

As described in Section 2.3.1 of the NBAF EIS, DHS's site selection process including site selection criteria that included, but were not limited to, such factors as proximity to research capabilities and workforce. It has been shown that modern biosafety laboratories can be safely operated in populated areas. An example is the Centers for Disease Control and Prevention in downtown Atlanta, Georgia, where such facilities employ modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF.

Comment No: 6 Issue Code: 15.4

DHS notes the commentor's concern. The economic effects of construction and operation of the NBAF at the Manhattan Campus Site Alternative are included in Section 3.10.4 of the NBAF EIS.

Comment No: 7 Issue Code: 21.4

DHS notes the commenter's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period. In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

Comment No: 8 Issue Code: 11.4

DHS notes the commentor's concerns regarding earthquakes. Section 3.6.1 of the NBAF EIS describes the methodology used to assess each site's potential seismic consequences, and Section 3.6.4 specifically describes the Manhattan Campus Site. Section 3.6.4.1 discusses the Humboldt Fault system and was considered in the analysis of seismic risk to the Manhattan Campus Site. The NBAF would be built to meet or exceed all applicable building codes for seismic safety. Section 3.14.3.2 further addresses NBAF design criteria and accident scenarios associated with natural phenomena events such as earthquakes.

Comment No: 9 Issue Code: 21.4

DHS notes the commenter's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period. In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

DHS acknowledges commentor's statement that safety at the NBAF is not guaranteed. DHS also notes that the risk of an accidental release of a pathogen from the NBAF is extreemly low. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. For example, as described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. The risk of an accidental release of a pathogen is extremely low. Oversite of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the

Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee.

Comment No: 10 Issue Code: 2.0

DHS notes the commentor's lack of confidence in the DHS and concerns regarding safe facility operations. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF, would enable NBAF to be safely operated with a minimal degree of risk, regardless of the site chosen. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 and Appendix E of the NBAF EIS. The risks were determined to be low for all site alternatives. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, then site-specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the area.

DHS also notes the commentor's concern with monitoring for disease releases. DHS would have site-specific standard operating / monitoring procedures and response plans in place prior to the initiation of research activities at the proposed NBAF. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee.

Comment No: 11 Issue Code: 24.1

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative.

Comment No: 12 Issue Code: 5.0

DHS notes the commentor's suggestion. However, as described in Chapter 1 of the NBAF EIS, the purpose and need for the proposed action encompasses the need for integrated, BSL-4 laboratories in the United States necessary to conduct research and develop countermeasures for zoonotic and foreign animal diseases.

**Leopold, Tom**

**Page 1 of 1**

**PD0370**

August 25, 2008

Yeah.

My name's Tom Leopold and I'm calling from [redacted] Kansas about a editorial in tonight's *Manhattan Mercury*. The editorial page is written by Dan Thompson who is a Jones Professor of Production, Medicine and Epidemiology at KSU. And he asked the question, "Wouldn't it be nice to have regular flights in and out of Manhattan without having to stop in Kansas City, Salina and McCook to get somewhere?" Well, you know I submit to you, myself and others could care less. We kind of like our little town the way it is. He suggests that if I were a scientist at Plum Island given the choice where to move myself and family, it wouldn't take me long to figure out that Manhattan is the place to put down some roots. Well, that suggestion just doesn't sit too well with me. His willingness to change the flavor of our town shows absolutely no consideration of the generations of folks who have called Manhattan home for year, after year, after year.

I'd like to ask him a question. How would he like to live next to home of the world's worst biological pathogens on earth, guarded by armed guards?

Well, I guess we know his answer and I guess you know mine.

My final comment on the thing, he says if the decision was handled as a business matter, it would be done already and Governor Kathleen Sebelius would have already turned over the sod with a golden shovel.

1| 24.1 Well if it was, as he suggests, handled as a business matter, it would be built on Plum Island. Therefore minimizing the economic loss, should the unthinkable, which no one
2| 15.0 can guarantee cannot happen, happen.

3| 25.4 I hope and pray that you folks at the Department of Homeland Security have the wisdom to keep it off the mainland and at least out of Manhattan, Kansas where we have the largest concentration of livestock in the country.

Okay, thanks again. I guess this thing's about over. It's been fun talking to you.

Bye.

Comment No: 1 Issue Code: 24.1
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative in favor of the Plum Island Site Alternative.

Comment No: 2 Issue Code: 15.0
DHS notes the commentor's concerns. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, then site specific protocols and emergency response plans would be developed, in coordination with local emergency response agencies, that would consider the diversity and density of human, livestock, and wildlife populations residing within the area.

Comment No: 3 Issue Code: 25.4
DHS notes the commentor's opposition to the five mainland site alternatives.

**Leopold, Tom**

**Page 1 of 2**

**PD0242**

August 22, 2008

1| 25.4
2| 5.0

Hi. My name's Tom Leopold and I'm calling from [redacted] Kansas in opposition to building this bio-4 lab in Kansas and on the mainland. I'd like to give you a quote that was in our tonight's paper from a scientist. His name is Juergen Richt. And in this article he notes that Canada and Germany have bio-4 labs. And the Canadian lab is located in Winnipeg - one hour north of the U.S. border. And he says that foot and mouth disease is already being conducted there.

3| 21.4

And this is a direct quote. He said, "that if they had an accident, foot and mouth disease would be in North Dakota in several hours." Well, I haven't looked at the map but I'm pretty sure that Winnipeg's quite a ways from North Dakota. And if you took that distance and drew a radius out of Manhattan, Kansas, we're talking about one hell of a lot of livestock that would be exposed to it, probably the most, the largest concentration of livestock in the country. And it comes back to me again, what was said at the last meeting, when the Department of Homeland Security was in town about common sense. It seems to me again that common sense dictates that you build it someplace other than the largest concentration of livestock in the country.

2 cont.| 5.0

4| 24.5

Wouldn't that be on a island? Or God forbid, if it would have to be on the mainland! I don't think they have large populations in Mississippi. Those people want it. I don't know why. I think they want it because of economics. But the point I'm trying to make is this scientist seems to think that it would spread one hour north that quick. So why build it in the middle of livestock country?

I also have a problem with this Tom Thornton. He's the head of this lobbyist organization that's been hired to promote this thing. And by his own admission in the… on the editorial page today, he's…he's only been in Kansas for two years. He lives down in Kansas City. So, number one if an outbreak breaks out it's not going to affect him. His job is to sell this to us.

You know, we're a small town. We like it the way it is. We don't…a lot of us locals, some of us have only been here our lifetime, some of us have been here for generations and we don't take too kindly to a paid lobbyist coming in here, trying to sell us a bill of goods. Granted, he's looked at the research and this and that but, you know the guy went to school in Wisconsin, Madison. Well, the folks in Madison, Wisconsin decided that it wasn't such a good idea. So I have a little bit of a problem about the way they've been trying to slide this all by us under the radar. Course anything's legal in love and war but what I'm also trying to get at is...is the way that the Department of Homeland Security presented this whole thing. I went to the scoping meeting. I went to both meetings and I had the definite impression that they were trying to reassure us that everything's cool with this thing and ….glossed over the GAO report.

Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the five mainland site alternatives including the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 5.0
DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 3 Issue Code: 21.4
DHS notes the commentor's concern regarding the impact from a release of Foot and Mouth Disease (FMD) from the NBAF operation at the Manhattan Campus site. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. While the risk of an accidental release of a pathogen is extremely low, the economic effect would be significant for all sites. Section 3.14 and Appendix E of the NBAF EIS investigate the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, DHS cannot guarantee that the NBAF would never experience an accident. However, the risk of an accidental release of a pathogen from the NBAF is extremely low. The economic impact of an accidental release, including the impact on the livestock-related industries, is presented in Section 3.10.9 and Appendix D of the NBAF EIS. The major economic effect from an accidental release of a pathogen would be a potential ban on all U.S. livestock products until the country was determined to be disease-free. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF at the Manhattan Campus Site, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area, to include agricultural livestock. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. Emergency response plans will include the current USDA emergency response plan for foot and mouth disease (FMD) which includes compensation for livestock losses.

Comment No: 4 Issue Code: 24.5

DHS notes the commentor's statement.

**Leopold, Tom**

**Page 2 of 2**

**PD0242**

And I also have a little problem. I received a post card telling me that the meeting was going to be held. I think that was because I signed up for the scoping meeting. I talk to people daily that don't know about this. And I wonder ...and I would be willing to bet on it, that had some sort of information gathering system similar to the way they gather Census information, if people had been asked straight out on the street like they do in the census gathering information, I would venture to say that people wouldn't really want it in their back yard.

5| 4.0

Many, many of the locals are just now becoming aware of it. And I think….as you can tell by the website and some of the news reports…they're scrambling to get a grip on this thing. And we really don't want it in our hometown and we don't like the…somebody coming in from Illinois that has only been here for two years or a scientist that spoke at the meeting, he spoke at the meeting that oh, you know, I've been here for nine months and I like this town. I can get to the airport in 10 minutes and from there I can fly to an international airport. And....this is all just great, you know. Build me a…build me a place where I can do my research and that'd be really nice. Well, okay. No one can dispute the fact that you need to build the damn thing. The research needs to be done but it doesn't need to be done in the middle of the largest concentration of livestock in the country. Stick it on an island or out in the desert or someplace where if it spreads in an hour it's not going to be an economic disaster to my friends and farmers that are ranchers.

1 cont.| 25.4

2 cont.| 5.0

I also addressed in another phone call what I consider the economic losses that we're going to have just by the fact of having it there. The fact that we're going to have to look at this thing lit up twenty-four hours with concertina wires and armed guards next to the retirement center. It's just not logical, it just doesn't belong here. We're a nice little town. We're doing just fine without it and, you know, I'm sure you people in Washington think, well, Kansas, is just a remote little place and we can stick it out there. It ain't going to hurt anything. Well, I think again, you have to consider the livestock here and the close proximity of it to where the proposed facility is being built.

6| 15.4

So, all I can hope for is that you guys approach this with an open mind and be aware of what the citizens of Manhattan are concerned about, not just what the politicians and the scientists that want to do the research and make the money.

Okay, thanks for taking my comments and maybe I'll talk to you before Monday.

Bye now.

Comment No: 5 Issue Code: 4.0

DHS notes the commentor's statement.

Comment No: 6 Issue Code: 15.4

DHS notes the commentor's concern. The potential biological and socioeconomic effects from a pathogen release from the NBAF are included in Sections 3.8.9 and 3.10.9 of the NBAF EIS, respectively. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. As noted in Section 3.10.9 and Appendix D, the major economic effect from an accidental release of a pathogen would be a ban on all U.S. livestock products until the country was determined to be disease-free. The mainland sites have similar economic consequences regardless of the livestock populations in the region.

**Leopold, Tom**

**Page 1 of 2**

**PD0255**

August 24, 2008

1| 25.4
2| 5.0

Yea. My name is Tom Leopold and I'm a longtime resident of [redacted] Kansas. I'm against building this lab in Manhattan or on the mainland. And a comment today was in reference to Scott Rusk, he's the director of the Pat Roberts home of the KSU Bio Research Center and he was at the last meeting as I was. And I wanted to quote him from the Op Ed page of our local paper, Manhattan Mercury, Tuesday, July 22, 2008. And he's talking about the center and what could happen. He said: "Can events happen that result in the release of infectious material? While highly unlikely, such a scenario is not impossible. That's why new bio containment facilities are designed and built with the safeguards above. Just like a seat belt and having air bags reduce the risk of injury in a car accident, safety practices, proper equipment, and training help make bio containment research safe."

Well, I'm having a little trouble with that analogy because I think about if that car ran into a freight train going 60 miles an hour those people are going to be dead. People die everyday with seat belts and airbags. So, I don't think that analogy quite works. In fact, what he's telling us that it's not unlikely that such a scenario is possible and he's stating that safeguards will prevent that well, obviously that doesn't quite work and I've been sitting here trying to figure out why scientists want to do this kind of research. I know it's important. Why are they driven to walk into that lab and handle pathogens like that. And I got to thinking I'm a photographer, I've been a photographer for thirty years and the chemicals I use are safe but the photographers proceeding me had such a passion for their work that they would work with chemicals that risked their health and I think that is the same thing that these scientists are willing to do. And I respect them for that and I know it's important research. But I don't think it needs to be done here in Manhattan, Kansas with the largest concentration of livestock in the country. I think situated on a island like Plum Island would be better or in the desert where they exploded the atomic bombs, in the middle of nowhere where this thing can't get loose and do catastrophic damage.

1 cont.| 25.4
2 cont.| 5.0

I urge you guys to consider sticking it somewhere else. You know, the proponents of this have been highly organized with big, big bucks to hire a lobbyist to present their case. The politicians speak for many, or claim to speak for many, but everyday I talk to people that aren't aware of this or they may be aware of it and they don't really know what the deal is or what the risks are. But you folks are making us take one heck of a risk in our community. Besides the fact that it is going to be lit up at night with concertina wire and armed guards. We've got a college up there, K-State University that I believe is the earliest land grant college in the country, if not, it's one of the first with big old limestone buildings, a beautiful place…a beautiful campus. And I wonder if students are really going to actually want to go there with that God-awful thing lit up in the middle of the night and armed guards and knowing that they're studying next to the worst biological pathogens on earth.

3| 7.4

Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the five mainland site alternatives including the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 5.0
As described in Section 2.4.3 of the NBAF EIS, other potential locations to construct the NBAF were considered during the site selection process but were eliminated based on evaluation by the selection committee. It was suggested during the scoping process that the NBAF be constructed in a remote location such as an island distant from populated areas or in a location that would be inhospitable (e.g., desert or arctic habitat) to escaped animal hosts/vectors; however, the evaluation criteria called for proximity to research programs that could be linked to the NBAF mission and proximity to a technical workforce. The Plum Island Site is an isolated location as was suggested while still meeting the requirements listed in the EOI.

Comment No: 3 Issue Code: 7.4
DHS notes the commentor's concern regarding the visual effects of the NBAF at the Manhattan Campus Site, which are described in Section 3.2.4 of the NBAF EIS. DHS recognizes that the NBAF would be a distinctive visible feature including at night due to lighting and would alter the viewshed of the area. The NBAF would employ the minimum intensity of lighting that is necessary to provide adequate security. Mitigative measures, such as shielded lighting, will be considered in the final design of the NBAF.

**Leopold, Tom**

**Page 2 of 2**

**PD0255**

I just…our community's growing. We've got a bunch of stuff going on, plus our economy's strong and I just don't think we need it there. We've got enough glory with our football team. I wish there was more people that would take an active…that would be active in contacting you and getting this message across. There was…let me see if I can find it… I may have to call you back on this one–article in today's paper. Nah, don't have it handy. Oh, my wife had it. Let me see. This is a news article not on the Op Ed page, a news article. Let me read it to you, the end of it:

Could Manhattan win? Absolutely. Manhattan's asset, especially the potential for collaborative research and environment friendly site make it a significant player.

The outstanding question might be whether backers of the local site have done what they should have done these past three weeks – ramped up a campaign to get individual folks, especially farmers, to flood DHS' mailbox with messages of endorsement that would more than offset the biggest potential weakness – the idea that public support here might be divided.

Theoretically that could still happen although given DHS' Monday deadline for accepting feedback, the clock is running short.

I'm ashamed and embarrassed that our local newspaper would take a side of this argument in a news article. I certainly wouldn't fault them for running something like that on the Op Ed page. But this is a news article and they're asking… what I'm trying to tell you is, there seems to be a massive campaign from the Governor to the Federal politicians to the State politicians to the local politicians to the scientists who would love to have a new playground built. And I don't use that word playground negatively. They love what they're doing and they should be respected for what they're doing. But there is a big campaign to get this here. And there's also a lot of local people that have been here for a long time – third and fourth generation people – that aren't happy about transient – what they're calling transient people – this Tom Thornton that's been hired, to be the lobbyist for the campaign. Even the University President is transient. They're trying to change our community in a direction that we really don't want it to go. It needs ….scratch that off… What I'm trying to tell you, is that there's a lot of people out here that really don't want it and it really doesn't belong here.

4| 27.0

And again, I'll just go back to what was said at the last scoping meeting, not the scoping meeting – the last meeting we had in town here that ….common sense dictates that you don't build this in the middle of the largest concentration of livestock in the country. And, if for no other reason, I think that needs to be taken into consideration.

2 cont.| 5.0

Okay, thanks for your time on this matter. I'll probably talk to you tomorrow.

Comment No: 4 Issue Code: 27.0

DHS notes the commentor's views. DHS is committed to providing public access to pertinent information. To date, DHS has provided multiple opportunities for the public to provide comment and input to the environmental impact analyses presented in the NBAF EIS. An initial scoping comment period of 60 days followed the issuance of a Notice of Intent to prepare an EIS. Once a draft of the EIS was published, another notice was issued that provided 60 days for comment. DHS accepted comments submitted by various means: mail, toll-free telephone and fax lines, NBAF Web page, and public meetings. DHS gave equal consideration to all comments, regardless of how or where they were received. All comments received during the public comment periods have been considered in this NBAF EIS.

**Leopold, Tom**

**Page 1 of 1**

**PD0303**

August 25, 2008

Yeah.

My name is Tom Leopold, and I'm calling from [redacted] Kansas to express my opposition to building your facility on the mainland and specifically in Manhattan, Kansas.

1| 25.4 I attended the last meeting when you visited the site, and Senator Brownback spoke and stated that building the facility in Manhattan, Kansas had the full support of our community, and I want you to know that....well you know, having attended the meeting, that there was some opposition at that meeting. And I want you to know that there is more opposition now. So, I'm not speaking just for me, I'm speaking for some of my friends and neighbors and farmers and ranchers. I've spoken to them and some of them are still not even aware of this, and when I mention it they think, Jesus, this is the craziest idea they ever heard.

Some of the K-Staters' (people that work up at K State) are afraid to comment because their jobs might become at risk. I hope they're calling anonymously and letting their feelings be known.

2| 21.4
3| 11.4
4| 15.4
5| 21.4
6| 5.0

I could go through the whole laundry list of reasons we don't want it, you know the recent tornado, the possibility of a earthquake, the fact that it's going to have armed guards, and concertino wire right next to a first class retirement center. The fact that I think it's going to destroy our economy....do more damage to our economy then it's going to do good, just being there let alone if the unthinkable happens, and given the fact of human error, that is a possibility. I think it needs to be someplace on an island or in the desert, certainly not in Manhattan, Kansas in the middle of the largest concentration of livestock in the country.

Well, thank you and I hope you make a wise decision.

Bye, now.

Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the five mainland site alternatives including the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 21.4
DHS notes the commenter's concern regarding potential tornado impacts to the NBAF. The NBAF would be designed and built to withstand the normal meteorological conditions that are present within the geographic area of the selected site (hurricanes, tornados, etc.). Given the nature of the facility, more stringent building codes are applied to the NBAF than are used for homes and most businesses, regardless of which NBAF site is chosen. The building would be built to withstand wind pressures up to 170% of the winds which are expected to occur locally within a period of 50 years. This means the building's structural system could resist a wind speed that is expected to occur, on the average, only once in a 500 year period.
In the unlikely event that a 500-year wind storm strikes the facility, the interior BSL-3Ag and BSL-4 spaces would be expected to withstand a 200 mph wind load (commonly determined to be an F3 tornado). If the NBAF took a direct hit from an F3 tornado, the exterior walls and roofing of the building would likely fail first. This breach in the exterior skin would cause a dramatic increase in internal pressures leading to further failure of the building's interior and exterior walls. However, the loss of these architectural wall components should actually decrease the overall wind loading applied to the building, and diminish the possibility of damage to the building's primary structural system. Since the walls of the BSL-3Ag and BSL-4 spaces would be reinforced cast-in-place concrete, those inner walls would be expected to withstand the tornado.

Comment No: 3 Issue Code: 11.4
DHS notes the commentor's concerns regarding earthquakes. Section 3.6.1 of the NBAF EIS describes the methodology used to assess each site's potential seismic consequences, and Section 3.6.4 specifically describes the Manhattan Campus Site. Section 3.6.4.1 discusses the Humboldt Fault system and was considered in the analysis of seismic risk to the Manhattan Campus Site. The NBAF would be built to meet or exceed all applicable building codes for seismic safety. Section 3.14.3.2 further addresses NBAF design criteria and accident scenarios associated with natural phenomena events such as earthquakes.

Comment No: 4 Issue Code: 15.4
DHS notes the commentor's concern. The potential biological and socioeconomic effects from a pathogen release from the NBAF are included in Sections 3.8.9 and 3.10.9 of the NBAF EIS, respectively. The risk of an accidental release of a pathogen is extremely low, but DHS acknowledges that the possible effects would be significant for all sites. As noted in Section 3.10.9 and Appendix D, the major economic effect from an accidental release of a pathogen would be a ban on all U.S. livestock products until the country was determined to be disease-free. The mainland sites have similar economic consequences regardless of the livestock populations in the region.

Comment No: 5 Issue Code: 21.4

DHS notes the commentor's concern regarding the potential consequences from a NBAF accident or pathogen release as the result of human error. As described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B of the NBAF EIS provides a comprehensive list of BSL-3 and BSL-4 laboratoryaccidents results, and consequences of theaccidents Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including external events such as a terrorist attack. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Comment No: 6 Issue Code: 5.0

As described in Section 2.4.3 of the NBAF EIS, other potential locations to construct the NBAF were considered during the site selection process but were eliminated based on evaluation by the selection committee. It was suggested during the scoping process that the NBAF be constructed in a remote location such as an island distant from populated areas or in a location that would be inhospitable (e.g., desert or arctic habitat) to escaped animal hosts/vectors; however, the evaluation criteria called for proximity to research programs that could be linked to the NBAF mission and proximity to a

technical workforce. The Plum Island Site is an isolated location as was suggested while still meeting the requirements listed in the EOI.

**Leopold, Tom**

**Page 1 of 1**

**PD0349**

August 25, 2008

Hi.

1| 25.4
2| 5.0

This is Tom Leopold and I'm calling from [redacted] Kansas to again voice my opposition to building it in Manhattan or anywhere on the mainland. And I know this is the end of the comment session, but I want you to be aware that there's a bunch of people in Manhattan that are still opposed to this and more becoming aware of it every day, and I don't think that they're about to give up. They don't want this in their community. These are second, third generation people that have been here for a long time, and don't appreciate a bunch of transients, lobbyists coming in and for building this facility.

And at the risk of stealing the thunder from those boys down in North Carolina, I think some of us are prepared to lay down in front of that bulldozer if that's what it comes to. And I urge you to use some wisdom in your judgment so that you don't have to build this thing over a bunch of dead bodies.

2 cont.| 5.0

Put it on an island where it belongs, not in the middle of the largest livestock concentration in the country.

Okay, hopefully this will have a happy ending.

See ya.

Bye.

Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the five mainland site alternatives including the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 5.0
DHS notes the commentor's opposition to the five mainland site alternatives.

**Levier, Virginia**

**Page 1 of 1**

**PD0183**

August 22, 2008

My name is Virginia Levier. I live [redacted] in [redacted] Kansas. I do not want the bio lab here. It's dangerous and we don't want it in town. It's too close to us. It needs to be way out farther. So my answer to this is no.

1| 25.4
2| 5.0
3| 21.4

Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 5.0
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 3 Issue Code: 21.4
DHS notes the commentor's concerns regarding the impact of a pathogen release on the local population, livestock industry, businesses and infrastructure. The NBAF would be designed, constructed, and operated to ensure the maximum level of public safety and to fulfill all necessary requirements to protect the environment. Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including releases due to weather events. The chances of an accidental release are low. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release based on human error are low in large part due to the design and implementation of biocontainment safeguards in conjunction with rigorous personnel training. For example, as described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B to the EIS describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations, including institutionalized populations, residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of the NBAF, would enable the NBAF to be safely operated.

**Levine, Alan**

**Page 1 of 1**

**WD0522**

**From:** Levine, Alan P [redacted]
**Sent:** Wednesday, August 06, 2008 12:03 PM
**To:** NBAFProgramManager
**Subject:** NO TO THE NBAF

1| 25.3 Please do not bring a new Bio- and Agro- Defense Facility to Butner, North Carolina.

2| 21.3 * This is a research lab which studies animal and animal to human diseases- which have no treatment and are deadly

3| 18.3 * The NBAF will perform research on large animals- which when infected, will produce large amounts of infected waste (carcasses)

4| 12.3 * This waste will be treated and released to the South Granville water treatment facility and then into Falls Lake
* 4 other water reservoirs are within 5 miles of this site

5| 15.3 * This lab will employ up to 350 people- many will be the employees of the current facility and from a private firm based in Alaska
* Butner is home to more than 7,000 institutionalized people- who cannot relocate or evacuate

2 cont.| 21.3 * 103 accidents were ³reported² in high containment labs over the past 4 years (90% caused by human error)

Thank you,
Alan Levine
[redacted] NC

Comment No: 1 Issue Code: 25.3
DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 21.3
DHS notes the commentor's concern regarding the potential consequences from a NBAF accident or pathogen release as the result of human error. As described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B of the NBAF EIS provides a comprehensive list of BSL-3 and BSL-4 laboratoryaccidents results, and consequences of theaccidents Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including external events such as a terrorist attack. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

Comment No: 3 Issue Code: 18.3
DHS notes the commentor's concern about animal carcass disposal. Section 3.13.2.2 in Chapter 3 of the NBAF EIS addresses the technologies being considered for the treatment of animal carcasses and pathological waste. In addition, Table 3.13.2.2-4 provides a brief description and comparison of the three most likely technologies being considered (i.e., incineration, alkaline hydrolysis, and rendering). As shown on the table, all of these technologies produce non-infectious or sterile

residuals.

Comment No: 4 Issue Code: 12.3

DHS notes the commentor's watershed concern. The NBAF EIS Section 3.13.8 describes the Waste Management processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3.7 and 3.7.7 describe standard methods used to prevent and mitigate potential spills and runoff affects

Comment No: 5 Issue Code: 15.3

DHS notes the commentor's concerns. The economic effects of the NBAF at the Umstead Research Farm Site are included in Section 3.10.7 of the NBAF EIS. The proposed action will create temporary jobs during the 4-yr construction phase and permanent jobs upon completion of the facility. Section 3.10.7.2 states that the majority of the construction workers would be drawn from the study area or would commute from the surrounding counties. Upon the facility's completion, permanent employees will include scientific and support staff as well as operations, maintenance and security staff. A portion of the permanent jobs at the NBAF will be filled by the local labor force. Furthermore, household spending by new residents and the operations of the NBAF are expected to create job opportunities in non-specialized areas such as food services and drink establishments and wholesale trade, which would be filled by the local labor force (Section 3.10.7.3).

**Lewis, Gretchen**

**Page 1 of 1**

**PD0336**

August 25, 2008

Hello,

1| 25.4
2| 5.0

My name is Gretchen Lewis, and I live in [redacted] Kansas. And I wish to register my opposition to the NBAF in Manhattan, Kansas, and actually on the mainland in the United States.

3| 21.4

1 cont.| 25.4
2 cont.| 5.0

I feel that this facility is not....does not belong on the mainland. I think it's a dangerous facility. The labs have expanded much more quickly than we can staff them, and I think that the possibility of human error is much too great. So, I am opposed to the NBAF anywhere on the mainland, but especially in Manhattan, Kansas.

Thank you.

Bye-bye.

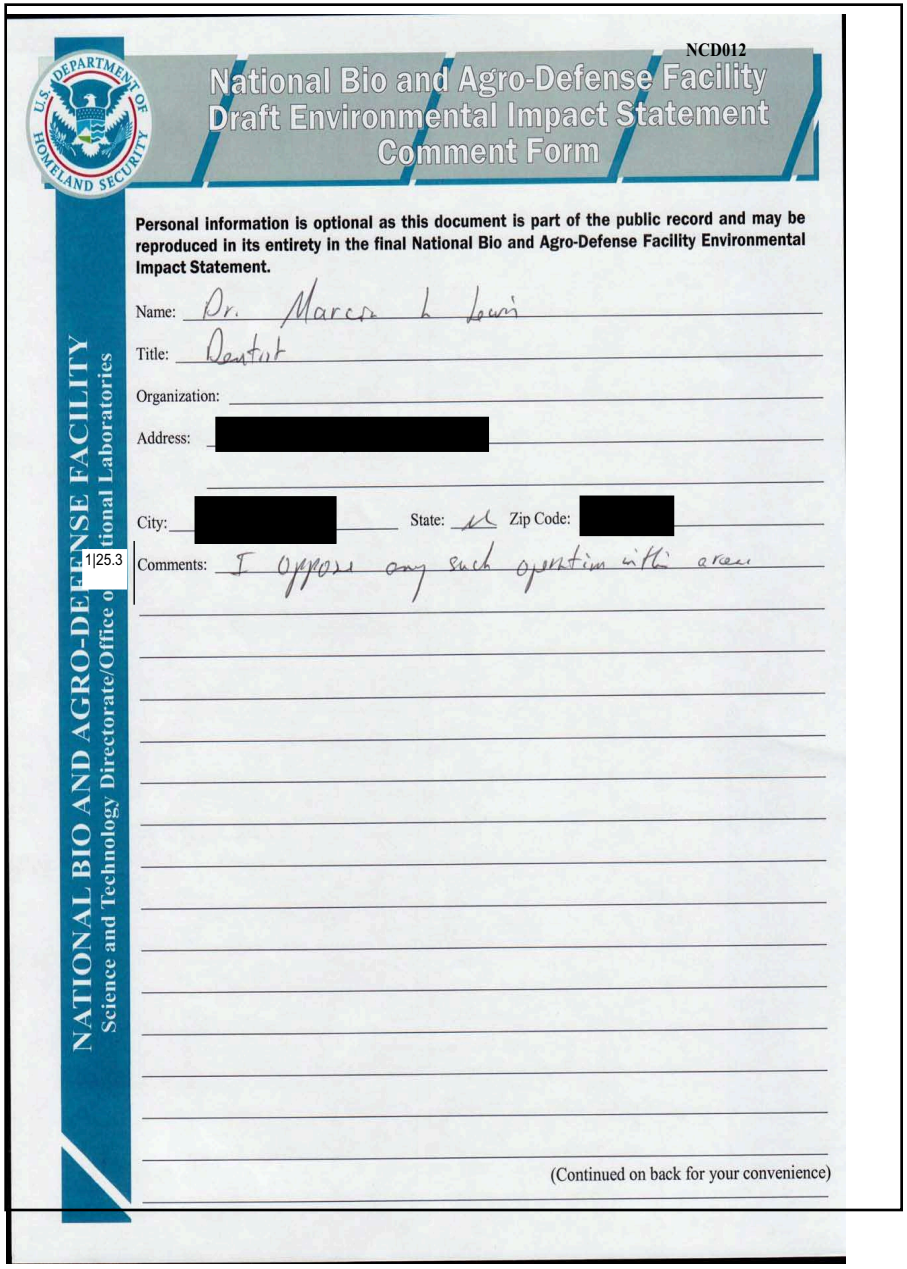
Comment No: 1 Issue Code: 25.4
DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

Comment No: 2 Issue Code: 5.0
DHS notes the commentor's opposition to the five mainland site alternatives.

Comment No: 3 Issue Code: 21.4
DHS notes the commentor's concern regarding the potential consequences from a NBAF accident or pathogen release as the result of human error. As described in Section 2.2.2.1 of the NBAF EIS, all laboratory staff would receive thorough pre-operational training, as well as ongoing training, in the handling of hazardous infectious agents, understanding biocontainment functions of standard and special practices for each biosafety level, and understanding biocontainment equipment and laboratory characteristics. Appendix B of the NBAF EIS provides a comprehensive list of BSL-3 and BSL-4 laboratoryaccidents results, and consequences of theaccidents Section 3.14 and Appendix E of the NBAF EIS, investigates the chances of a variety of accidents that could occur with the proposed NBAF and consequences of potential accidents, including external events such as a terrorist attack. Accidents could occur in the form of procedural violations (operational accidents), natural phenomena accidents, external events, and intentional acts. Although some accidents are more likely to occur than others (e.g., safety protocol not being followed), the chances of an accidental release are low. The specific objective of the hazard identification, accident analysis, and risk assessment is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The risk of an accidental release of a pathogen is extremely low. As set out in Section 3.14.3.4 of the NBAF EIS, employees and contractors will be screened prior to employment or engagement and monitored while working, among other security measures. In addition, oversight of NBAF operations, as described in Section 2.2.2.6 of the NBAF EIS, will be conducted in part by the Institutional Biosafety Committee (IBC), which includes community representative participation, and the APHIS Animal Research Policy and Institutional Animal Care and Use Committee. Should the NBAF Record of Decision call for the design, construction, and operations of the NBAF, site specific protocols would then be developed in coordination with local emergency response agencies and would consider the diversity and density of populations residing within the local area. The need for an evacuation under an accident conditions is considered to be a very low probability event. DHS would have site-specific standard operating procedures and emergency response plans in place prior to the initiation of research activities at the proposed NBAF.

**Lewis, Marcia**

**Page 1 of 1**



NCD012

National Bio and Agro-Defense Facility
Draft Environmental Impact Statement
Comment Form

**Personal information is optional as this document is part of the public record and may be reproduced in its entirety in the final National Bio and Agro-Defense Facility Environmental Impact Statement.**

Name: Dr. Marcia L Lewis

Title: Dentist

Organization:

Address: [redacted]

City: [redacted] State: [illegible] Zip Code: [redacted]

1|25.3

Comments: I oppose any such operation with in area.

(Continued on back for your convenience)

NATIONAL BIO AND AGRO-DEFENSE FACILITY
Science and Technology Directorate/Office of National Laboratories

Comment No: 1 Issue Code: 25.3

DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

**Lindeman, Carma**

**Page 1 of 1**

PD0233

August 22, 2008

1| 25.4 My name is Carma Lindeman. I live in [redacted] Kansas. I just want to say that I am not in favor of the NBAF coming to Manhattan.

Thank you.

Comment No: 1 Issue Code: 25.4

DHS notes the commentor's opposition to the Manhattan Campus Site Alternative.

**Livingston, Elta**

**Page 1 of 1**

PD0353

August 25, 2008

My name is Elta Livingston. I live in [redacted] Mississippi close to Flora, Mississippi, which is under consideration for the location of the bio lab.

1| 24.5

We are excited about this opportunity and encourage all persons involved to vote to locate the facility in Flora, Mississippi.

We look forward to being a part of this national endeavor under CDC.

Thank you for the opportunity to support this event.

Bye.

Comment No: 1 Issue Code: 24.5

DHS notes the commentor's support for the Flora Industrial Park Site Alternative.

**Livingston, Helen**

**Page 1 of 1**

WD0426

**From:** Helen Livingston [redacted]
**Sent:** Thursday, August 21, 2008 2:52 PM
**To:** NBAFProgramManager
**Subject:** Opposition to NBADF

To:
U.S. Department of Homeland Security
Science and Technology Directorate
James V. Johnson: Mail Stop #2100
245 Murray Lane SW, Building 410
Washington, DC 20528

Dear Mr Johnson,

1| 25.0 Please look beyond the Environmental Impact Statement (DEIS). A National Bio- and Agro-Defense Facility (NBADF) would cause untoward environmental and economic damages to any area, and would invite enormous problems for our country on many levels

Sincerely yours,

Helen Livingston
[redacted]
[redacted] NC [redacted]

Comment No: 1 Issue Code: 25.0
DHS notes the commentor's opposition to the NBAF.

**Lloyd, James Glen**

**Page 1 of 1**

**PD0109**

August 19, 2008

Hello,

1|25.3 This is James Glen Lloyd, [redacted] North Carolina. I want to voice my opposition to the NBAF being sited in Butner, North Carolina. The environmental impact statement,
2|12.3; 3|20.3 the EIS does not adequately address the groundwater, possible groundwater pollution, or the safety of the residents or the safety of all the inmates of all the federal facilities and state facilities around the Butner area.

4|2.0 And frankly I believe the whole thing is just a smoke screen for whatever your true intentions are and if you site it here I will actively oppose it in any and every way that I can, peacefully.

Thank you.

Comment No: 1 Issue Code: 25.3
DHS notes the commentor's opposition to the Umstead Research Farm Site Alternative.

Comment No: 2 Issue Code: 12.3
DHS notes the commentor's groundwater concerns. Section 3.7.7.1.3 of the NBAF EIS describes the Umstead Research Farm Site's local aquifer systems, preliminary subsurface investigation, and historical groundwater assessment actions. Sections 3.7.7.2.3 and 3.7.7.3.3 describe the potential construction and operational groundwater consequences.

Comment No: 3 Issue Code: 20.3
DHS notes the commentor's concern. The risks and associated potential effects to human health and safety were evaluated in Section 3.14 of the Draft EIS. The risks were determined to be low for all site alternatives. The impacts analysis specifically included consideration of environmental justice concerns to include an assessment of the potential for disproportionately high and adverse effects to minority or low-income populations, as further described in Section 3.1 of the NBAF EIS. No disproportionately high and adverse effects to environmental or human resources are evident for the proposed Umstead Research Farm Site from normal facility operations.

Comment No: 4 Issue Code: 2.0
DHS notes the commentor's lack of confidence in the DHS. DHS has made every effort to explain the operational aspects of NBAF and has conducted a thorough and open public outreach program in support of the NBAF EIS that exceeded NEPA requirements. DHS prepared the NBAF EIS in accordance with the provisions of NEPA (42 U.S.C. 4321 et seq.) and CEQ's regulations for implementing NEPA (40 CFR 1500 et seq.). There would be no classifed research at the NBAF, however there may occassionally be classified FBI forensics cases. Currently, the PIADC facility publishes research in publicly available research journals; NBAF would publish its research in publicly available research journals as well. Decisions on whether to construct and operate the NBAF and, if so, where, will be based on the analyses presented in the NBAF EIS and other factors such as cost, engineering and technical feasibility, strategic considerations, policy considerations, and public input. A Record of Decision (ROD) that explains the final decisions will be made available no sooner than 30 days after the NBAF Final EIS is published. DHS believes that experience shows that facilities utilizing modern biocontainment technologies and safety protocols, such as would be employed in the design, construction, and operation of NBAF, would enable NBAF to be safely operated with a minimal degree of risk, regardless of the site chosen.

**Locke, Melinda**

**Page 1 of 1**

WD0503

**From:** Melinda Locke [redacted]
**Sent:** Friday, August 22, 2008 2:11 PM
**To:** NBAFProgramManager
**Subject:** NBAF

1| 24.4 I support NBAF in Kansas.

Thank you,

Melinda Locke

Comment No: 1 Issue Code: 24.4
DHS notes the commentor's support for the Manhattan Campus Site Alternative.

**Lotane, Mark**

**Page 1 of 1**

WD0568

**From:** [redacted] on behalf of Mark Lotane [redacted]
**Sent:** Sunday, August 24, 2008 4:57 PM
**To:** NBAFProgramManager
**Subject:** NBAF in Athens, Georgia

Dear NBAF Program Manager,

1| 25.2 I am STRONGLY opposed to the NBAF being in the Athens/Watkinsville area.
As a business owner (in the Real Estate sector) and owner of multiple properties in the [redacted] area I
2| 15.2 have no doubt that the potential dangers of such a site (whether real or perceived) will lower property values
downwind of the site. Within a 1 mile distance downwind of the proposed site there are literally millions of dollars
3| 9.2 of residential real estate in the path of any odors or debris that could possibly be released into the air.

4| 12.2 Not to mention the nearby streams which travel through some very valuable subdivisions. Also, The State Botanical
5| 13.2 Gardens are extremely close to the proposed site.

6| 2.0 Based on past history, I have zero confidence that the State and Federal agencies involved will protect our citizens and our lands from a site placed this close to highly populated and valuable real estate.

Sincerely,
Mark Lotane
[redacted]

Comment No: 1 Issue Code: 25.2
DHS notes the commentor's opposition to the South Milledge Avenue Site Alternative.

Comment No: 2 Issue Code: 15.2
DHS notes the commentor's concern. A discussion of the effects of the NBAF on property values was included in Section 3.10.3, which concluded that there is no empirical evidence that a facility such as the NBAF would reduce property values in the study area. It is possible that with the relocation of highly skilled workers to the immediate area, property values could increase due to an increase in demand.

Comment No: 3 Issue Code: 9.2
DHS notes the commentor's concern for air quality. The potential effects of NBAF operations on air quality are discussed in Section 3.4 of the NBAF EIS and includes the potential effects from incineration. Site-specific effects at the South Milledge Avenue Site are discussed in Section 3.4.3. Carcass/pathological waste disposal (incineration, alkaline hydrolysis, and rendering) is discussed in Section 3.13. Section 3.13.2 describes the comparison of technologies being considered for carcass/pathological waste disposal; alkaline hydrolysis would produce no emissions, and odors would be controlled with appropriate technology. Similarly for rendering, appropriate emissions and odor control technologies would be added as required by permit authorization(s). Air pollutant concentrations were estimated using SCREEN3, a U.S. EPA dispersion modeling program. Conservative assumptions were used to ensure the probable maximum effects were evaluated. Once the final design is determined, a more refined air emissions model will be used during the permitting process. The final design will ensure that the NBAF %does not significantly affect% the region's ability to meet air quality standards.

Comment No: 4 Issue Code: 12.2
DHS notes the commentor's concerns regarding possible impact to the area's water resources. The NBAF will be operated in accordance with the applicable protocols and regulations pertaining to stormwater management, erosion control, spill prevention, and waste management. Section 3.13.4 describes the waste management processes that would be used to control and dispose of NBAF's liquid and solid waste. Sections 3.3.3 and 3.7.3 describe standard methods used to prevent and mitigate potential spills and runoff affects.

Comment No: 5 Issue Code: 13.2
DHS notes the commentor's concern and acknowledges the proximity of the South Milledge Avenue Site to the State Botanical Garden. As described in Section 3.8.3.1.1 of the NBAF EIS, 80% of the site consists of pasture, and the adjacent lands consist of forested lands and small, perennial headwater streams. Approximately 30 acres of open pasture, 0.2 acres of forested habitat, and less than 0.1 acres of wetlands would be affected by the NBAF. However, construction and normal operations of the NBAF would have no direct impact on the State Botanical Garden as indicated in

Sections 3.8.3.2 and 3.8.3.3. Only minimal indirect effects would occur from operations due to increases in light and noise.

Comment No: 6 Issue Code: 2.0

DHS notes the commentor's lack of trust in the federal government. Section 3.14 and Appendix E of the NBAF EIS state that the specific objective of the hazard identification is to identify the likelihood and consequences from accidents or intentional subversive acts. In addition to identifying the potential for or likelihood of the scenarios leading to adverse consequences, this analysis provides support for the identification of specific engineering and administrative controls to either prevent a pathogen release or mitigate the consequences of such a release. The NBAF would provide state-of-the-art operating procedures and biocontainment features to minimize the potential for laboratory-acquired infections and accidental releases. The risk of an accidental release of a pathogen is extremely low. Appendix B describes biocontainment lapses and laboratory acquired infections. Laboratory-acquired infections have not been shown to be a threat to the community at large. Should the NBAF Record of Decision call for the design, construction, and operation of the NBAF then site-specific protocols would be developed, in coordination with local emergency response agencies that would consider the diversity and density of human, livestock, and wildlife populations residing within the local area. DHS would have site-specific standard operating procedures and response plans in place prior to the initiation of research activities at the proposed the NBAF.

**Lott, Tommy**

**Page 1 of 1**

Aug 25 08 06:01p City Clerk 6622585331 p.1

**FD0085**

# CITY OF EUPORA

102 EAST CLARK AVENUE
EUPORA, MISSISSIPPI 39744
TELEPHONE: 662-258-2291
FAX: 662-258-5331

MAYOR
Tommy Lott
ATTORNEY
Hugh Gibson
CITY CLERK
Lisa Harbin
POLICE CHIEF
Gregg Turner

BOARD OF ALDERMEN
Henry Flowers
Mayor Pro Tempore
Dan Burchfield
Jack Haney
Robert C. Mays
Ricky Newton

August 22, 2008

U.S. Dept of Homeland Security
Science and Technology Directorate
Mr. James V. Johnson
Mail Stop #2100
Washington, DC 20528

As Mayor of the City of Eupora, MS and on behalf of our local community, we are very excited to learn of the possibility of the National BIO and Agro-Defense facility being located in our state.

1| 24.5 Job creation is badly needed in our local area and we feel we have the citizen labor and resources to compete for spin off companies the facility would require. Flora, MS is located an hour to an hour and a half south of Eupora, MS. Eupora is located at the intersections a Hwy 82 (four-lane) and Hwy 9 between Mississippi State University and the University of Mississippi.

It could be a strong possibility that our Webster County Development Council could persuade a spinoff company to locate in Webster County, MS. This would allow more of our young people to find employment locally. Keeping our younger generation from being forced to leave after graduation would result in growth for our city as well as many other local areas.

Thank you for considering Mississippi as a location. It would be a decision you would not regret.

Tommy Lott
Mayor

T

Comment No: 1 Issue Code: 24.5

DHS notes the commentor's support for the Flora Industrial Park Site Alternative.